

McMANIMON, SCOTLAND & BAUMANN, LLC

75 Livingston Avenue, Suite 201

Roseland, New Jersey 07068

(973) 622-1800

Anthony Sodono, III, Esq. (asodono@msbnj.com)

Michele M. Dudas, Esq. (mdudas@msbnj.com)

Sari B. Placona, Esq. (splacona@msbnj.com)

Counsel to Anthony Sodono, III, Temporary Receiver

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

COMMODITY FUTURES TRADING
COMMISSION,

Plaintiff,

v.

TRADERS GLOBAL GROUP INC., a New
Jersey corporation, d/b/a “My Forex Funds”;
TRADERS GLOBAL GROUP INC., a Canadian
business organization; and MURTUZA KAZMI,

Defendants.

Civil Action No. 3:23-cv-11808-ZNQ-TJB

**DECLARATION OF ANTHONY SODONO, III, TEMPORARY RECEIVER,
PURSUANT TO 28 U.S.C. § 1746**

ANTHONY SODONO, III, of full age, hereby certifies, pursuant to 28 U.S.C. § 1746,
as follows:

1. I am an attorney-at-law duly admitted to practice before this Court and am a member of the law firm of McManimon, Scotland & Baumann, LLC. My firm serves as counsel to me, as Temporary Receiver appointed in the above-referenced matter, pursuant to this Court’s August 29, 2023 Statutory Restraining Order (“SRO”). [ECF 13].

2. I hereby submit this Declaration in support of my Limited Objection to the Emergency Motion to modify the SRO, Appointment of Receiver and Related Relief [ECF 42] filed by defendants Traders Global Group Inc., a New Jersey corporation, d/b/a My Forex Funds,

Traders Global Group Inc., a Canadian business organization (collectively, “TGG”) and Murtuza Kazmi.

3. Annexed as **Exhibit “A”** is a true and accurate copy of an e-mail between my counsel and Stripe respecting TGG’s account dated September 8, 2023.

4. I declare under penalty of perjury that the foregoing is true and correct.

Dated: September 22, 2023

/s/ Anthony Sodono, III
Anthony Sodono, III, Esq.
McManimon, Scotland & Baumann, LLC
75 Livingston Avenue, Suite 201
Roseland, New Jersey 07068
(973) 622-1800
asodono@msbnj.com

EXHIBIT A

Michele M. Dudas

From: Tracy Talbot <tracyt@stripe.com>
Sent: Friday, September 8, 2023 10:36 AM
To: Sari B. Placona
Cc: Anthony Sodono; Michele M. Dudas; Diane Perrotta; Ashley Burden; Katherine Paulson; Engel, Jonathan; Davis, Elizabeth
Subject: Re: CFTC v. Traders Global Group, et al. - Stripe
Attachments: ~WRD0000.jpg

Thank you for your responses.

As we discussed yesterday, the funds are secure with Stripe and the plan for the call today is to discuss our potentially different legal arguments regarding whether the funds held in the reserve account are subject to the turnover order. We are still looking forward to that discussion.

I am copying our counsel, Jonathan Engel and Liz Davis, at Davis Wright Tremaine. They will be handling the call on our behalf and will provide dial-in information.

And on account access, we can work with you to set-up new log-in credentials if you'd like to access the accounts.

Regards,
Tracy

On Fri, Sep 8, 2023 at 4:42 AM Sari B. Placona <SPlacona@msbnj.com> wrote:

Tracy

As stated, we are available for a 1230 call, however, as per Mr. Sodono's email, that does not excuse Stripe from transferring the funds now to the Receiver's account. There should be no delay or discussion regarding the transfer of the funds. The order is clear and unambiguous regarding the transfer and any "chargeback" issues you alluded to yesterday can be dealt with in the ordinary course and we can discuss on the call.

I sent wire instructions yesterday.

Thank you

From Sari B. Placona, Esq.
Sent from my iPhone

On Sep 8, 2023, at 6:23 AM, Anthony Sodono <ASodono@msbnj.com> wrote:

Tracy

Good morning and thank you very much for your follow up. I am not exactly sure what you mean by "full access." We do not have any account information, passwords, etc. In addition to "full access," under the court order, I need to have the funds transferred to my trust account ASAP. We are available for a call, however, we would like to see the funds transferred before that call or the mechanics on your end on how the funds will be transferred. Much appreciated.

Anthony Sodono, III, Member/Partner
Chair, Bankruptcy & Restructuring Group
McManimon, Scotland & Baumann, LLC
75 Livingston Avenue | 2nd Floor | Roseland, NJ 07068
Direct Dial: 973-721-5038
Mobile: 732-236-9268
Email: ASodono@MSBNJ.COM
Website

Connect with MS&B on [LinkedIn](#) | [Twitter](#) | [Instagram](#)

From: Tracy Talbot <tracyt@stripe.com>
Sent: Thursday, September 7, 2023 11:25 PM
To: Sari B. Placona <SPlacona@MSBNJ.COM>; Anthony Sodono <ASodono@MSBNJ.COM>
Subject: CFTC v. Traders Global Group, et al. - Stripe

Dear Sari and Anthony,

Thank you for reaching out to Stripe this afternoon to discuss the pending matter directly with us. As we discussed, we are evaluating our position with respect to the funds currently on reserve in the applicable Stripe accounts, and I look forward to discussing this further with you tomorrow. Are you available for a call at 12:30 pm EST?

In addition, I understand that pursuant to the order appointing the receiver, you should have full access to the Stripe accounts at issue here. You indicated that you do not have access, but we are not aware of anything on our end limiting your access at this time. Please let me know if we can assist you in gaining access to the accounts.

Regards,

Tracy

Tracy Talbot
Litigation Counsel
tracyt@stripe.com

This message contains information which may be confidential and privileged. Unless you are the addressee (or authorized to receive for the addressee), you may not use, copy, or disclose to anyone the message or any information contained in the message . If you have received the message in error, please advise the sender by reply e-mail or contact the sender at McManimon, Scotland & Baumann, LLC by phone at (973) 622-1800 and delete the message. Thank you very much.
